

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO  
RICO

as representative of:

THE COMMONWEALTH OF PUERTO  
RICO, THE EMPLOYEE'S RETIREMENT  
SYSTEM OF THE GOVERNMENT OF THE  
COMMONWEALTH OF PUERTO RICO,  
AND THE PUERTO RICO PUBLIC  
BUILDINGS AUTHORITY

Debtors

PROMESA

Title III

Case No. 17-bk-3283 (LTS)

(Jointly Administered)<sup>1</sup>

**OBJECTION TO PLAN PROPONENT'S  
REVISED PROPOSED FINDINGS OF FACTS AND CONCLUSIONS OF LAW**

TO THE HONORABLE COURT:

COMES NOW **Finca Matilde, Inc.** ("Finca Matilde"), a creditor in the captioned case, whom, through the undersigned legal counsel, very respectfully state, pray, and Object to the RENEWED *[Proposed] Findings of Facts and Conclusions of Law in Connection with Confirmation of the Modified Eight Amended Title III Joint Plan of*

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 35(787)66-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801).

*Adjustment of the Common the Commonwealth of Puerto Rico, et al.* (the “Revised Proposed Order”) filed and proposed by the Financial Oversight and Management Board for Puerto Rico (“Oversight Board”) at Docket No. 19427, for the reasons stated herein below:

1. On November 28, 2021, the Oversight Board filed the *[Proposed] Findings of Facts and Conclusions of Law in Connection with Confirmation of the Modified Eight Amended Title III Joint Plan of Adjustment of the Common the Commonwealth of Puerto Rico, et al.* [Docket No. 19366]. Finca Matilde filed an objection to this proposed order on December 1, 2021 [Docket No. 19403].

2. On December 6, 2021, the Oversight Board filed the Revised Proposed Order [Docket No. 19427]. After reviewing the Revised Proposed Order, Finca Matilde submits that the objections initially raised have not been addressed. Thus, Finca Matilde hereby objects to the Revised Proposed Order for the reasons stated in the objection filed at Docket No. 19403 for the reasons stated therein which are hereby adopted by reference.

**WHEREFORE** Finca Matilde requests that this Honorable Court entertains the instant motion and moves Honorable Court deny the confirmation and approval of the Revised Proposed Order.

**I HEREBY CERTIFY**, that on this same date I electronically filed the foregoing with the Clerk of the Bankruptcy Court using the CM/ECF system, which will send electronic notification to all participants. Pursuant to the Fourteenth Amended Notice, Case Management and Administrative Procedures, the instant motion was served via First Class Mail upon the (i) Office of the United States Trustee, Edificio Ochoa, 500 Tanca Street, Suite 301, San Juan, P.R. 00901; (ii) Chambers of the Hon. Laura T. Swain; (iii) AAFAF and its counsel; (iv) the Oversight Board and its legal counsel, (v) Counsel for the Creditors Committee, (vi) Counsel for the Retiree Committee, the 20 largest creditors.

**RESPECTFULLY SUBMITTED,**

In San Juan, Puerto Rico, this 8<sup>th</sup> day of December of 2021.

**ISABEL FULLANA-FRATICELLI & ASSOCS., P.S.C.**

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